



THE REINCARNATION of TEA

Arthur Neal
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16th August 2005

Dear Mr. Neal and the National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. Tazo Tea supports the continued listing of the following National List substances:

Citric acid §205.605(a)(1)(ii) Needed to acidify our teas. Used in all cases to acidify hot fill ready to drink products and aseptic packed tea concentrate. We are not aware of a viable alternative for this product. Without citric acid, we would likely eliminate the organic claims on these products rather than reformulate.

The current annotation is appropriate.

Gums §205.606(b) Used as an ingredient in two of the flavors we use in organic chai. One flavor is an organic ginger oleoresin. The other is a non-organic vanilla wonf that is proprietary to Tazo, and we have not been able to obtain an organic match for. This is an agricultural product that is currently not available in organic form. Should it eventually become available as a certified organic product, we would use that form.

Bentonite §205.605(a)(2). Processing aid that is necessary for clarifying our teas. It is used to help remove undesirable material from our products. It is listed as GRAS by FDA under 21 CFR 184.1155 where it states that "Current good manufacturing practice results in no significant residue in foods".

Diatomaceous Earth §205.605(a)(7). Processing aid that is necessary for clarifying our teas. The current annotation is appropriate. It is used to help remove undesirable material from our products.

Gelatin This compound has been approved by the NOSB, but never made it through the USDA/NOP review process. We hope that this product will eventually get listed so that we can eventually write to support it's continued listing.

The previous three items are processing aids used to clarify our tea products. If the items are removed from the NOP list, industry would likely incur significant redevelopment and capital costs to change methods of clarification to maintain current flavor profiles. We are also challenged in that our products are 100% natural and all Kosher, so ingredients and process aids also have to meet the qualifications. (Example: We use fish gelatin, because it is Kosher)

Carbon dioxide §205.605(b)(8) Carbon dioxide is used as a solvent in the supercritical extraction of flavoring compounds. These flavor compounds are critical for our formulation and for consumer acceptance.

Chlorine materials §205.605(b)(9) Used as contact surface sanitizers. The safety of the organic food supply would be compromised by the removal of these important sanitizers from the National List.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Teri Danielson', with a large, stylized loop at the end.

p.p. Teri Danielson, Manager Plant Operations.